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UNITED STATES DISTRICT COURT

DISTRICT OF, NEVADA

HILLCREST INVESTMENTS, LTD., a
Canadian Corporation; AMERGOSA
ENTERPRISE, LLC.,
Plaintiffs,

vs.

AMERICAN BORATE COMPANY a foreign
corporation; AMERICAN BORATE COMPANY
OF TEXAS a foreign corporation, STATE
ENGINEER, STATE OF NEVADA,
DEPARTMENT OF CONSERVATION AND
NATURAL RESOURCES, DIVISION OF
WATER RESOURCES, A Nevada Political
Subdivision; RAMM Corporation, a Nevada
Corporation; UNITED STATES FISH AND
WILD SERVICE a division of the UNITED
STATES; NATIONAL PARK SERVICE, a
division of the UNITED STATES; and DOES I-
V, ROES VI-X,

Defendants.

Case No 2:21-cv-00964-RFB-NJK

**STIPULATION TO EXTEND DEADLINE
TO FILE RESPONSE TO
DEFENDANTS' AMERICAN BORATE
COMPANY AND AMERICAN BORATE
COMPANY OF TEXAS' RENEWED
MOTION FOR SANCTIONS AND REPLY
TO RESPONSE TO MOTION TO
RECONSIDER**

(SEVENTH REQUEST)

COMES NOW, Plaintiff **AMERGOSA ENTERPRISE, LLC** ("Plaintiffs") and
Defendants, **AMERICAN BORATE COMPANY AND AMERICAN BORATE COMPANY
OF TEXAS** (hereafter "American Borate") by and through their respective attorneys of record
hereby stipulate and agree as follows:

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1 The parties now make this seventh request for an extension for the deadline to file the Response
2 and the Reply, the additional time is needed to allow the parties to continue settlement negotiations
3 and to resolve confusion over whether current counsel will continue the representation of
4 Amergosa Enterprise, LLC. The parties request the extension until September 23, 2022. This is
5 the parties' seventh request.

6 **LEONARD LAW PC**

**LAW OFFICES OF BYRON
THOMAS**

7
8 /s/ Debbie Leonard

/s/ Byron E. Thomas


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10 Debbie Leonard
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13 Attorney for American Borate
14 Company and American Borate
Company of Texas

Attorney for Amargosa
Enterprises, Inc.

15 **IT IS SO ORDERED.**

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17 
18 **RICHARD E. BOULWARE, II**
19 **United States District Court**

20 DATED this 13th day of September, 2022.
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